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12 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

13 FEDERAL TRADE COMMISSION,

14 Civil Action No. 2:11-cv-00283-JCM-GWF

15 Plaintiff,

16 v.

17 IVY CAPITAL, INC., *et al.*,

18 Defendants, and

19 CHERRYTREE HOLDINGS, LLC, *et al.*,

20 Relief Defendants.

21 **STIPULATION FOR EXTENSION OF**
TIME FOR FEDERAL TRADE
COMMISSION TO RESPOND TO
MOTION FOR RELIEF UNDER FED. R.
CIV. P. 60(b) (ECF 449)
(FIRST REQUEST)

22 On May 25, 2021, defendants Benjamin Hoskins and Dream Financial and relief
23 defendants Leanne Hoskins, Oxford Financial LLC, and Mowab, Inc. moved under Fed. R. Civ.
24 P. 60(b) for relief from the “equitable monetary relief portion of the Court’s Final Judgment and
25 Order for Permanent Injunction and Monetary Relief.” *See* ECF No. 449. The Court issued that
underlying judgment on July 5, 2013. *See* ECF 409. Under L.R. 7-2(b), the Federal Trade
Commission’s response to the Rule 60(b) motion is due by June 8.

26 On June 2, counsel for the FTC requested an extension of one week, through June 15, for

1 the FTC to respond to the motion. FTC counsel was not part of the original trial team on this
2 case, and the extension request was made to allow for additional case file review. Counsel for
3 the moving parties consented to the FTC's request. This is the first stipulation for an extension
4 of time to respond to the Rule 60(b) motion.

5 WHEREFORE, the FTC and the moving parties stipulate that the FTC shall have until
6 June 15, 2021, to respond to the Rule 60(b) motion (ECF No. 449).

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8 SO STIPULATED, June 4, 2021.

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10 /s/ P. Connell McNulty

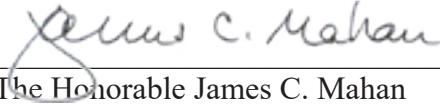
11 P. Connell McNulty
12 Attorney for Federal Trade Commission

13

14 /s/ David R. Koch

15 David R. Koch
16 Daniel G. Scow
17 Attorneys for Defendants Benjamin Hoskins and Dream Financial
18 and Relief Defendants Leanne Hoskins, Oxford Financial LLC, and
19 Mowab, Inc.

20 IT IS SO ORDERED:
21
22

23 
24 The Honorable James C. Mahan
25 United States District Court Judge

26 DATED: June 4, 2021

Certificate of Service

I hereby certify that on June 4, 2021, I electronically filed the foregoing document with the Court using CM/ECF, which will send a notice of electronic filing to all counsel of record.

Date: June 4, 2021 /s/ P. Connell McNulty
P. Connell McNulty